

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DANIEL WILLIAMS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 04-CV-10359-DPW
)	
HASSAN M. AHMED, STEPHEN)	
J. NILL, EDWARD T. ANDERSON,)	
PAUL J. FERRI, and PAUL J.)	
SEVERINO,)	
)	
Defendants,)	
)	
and)	
)	
SONUS NETWORKS, INC.,)	
)	
Nominal Defendant.)	

**PLAINTIFF DANIEL WILLIAMS' SUPPLEMENTAL MEMORANDUM OF LAW
IN RESPONSE TO THE COURT'S INQUIRY
CONCERNING PROPOSED DERIVATIVE LEAD PLAINTIFFS**

Plaintiff Daniel Williams ("Williams") submits this Memorandum of Law in response to the Court's inquiry concerning the criteria for selecting a lead plaintiff in the presently pending shareholder derivative actions brought on behalf of Nominal Defendant Sonus Networks, Inc. ("Sonus").

Presently pending before the Court are competing motions for Lead Plaintiff and Lead Counsel for the prosecution of three pending derivative actions brought on behalf of Nominal Defendant, Sonus. The three actions, Williams V. Ahmed, et al., No. 04-CV-10359; Pisnoy v. Ahmed, et al., No. 04-CV-10576 and Burk v. Ahmed, et al., No. 04-CV-10384 were consolidated under Case No. 04-CV-10359. Williams, Plaintiff Michael Pisnoy ("Pisnoy") and Plaintiff Michelle Burk ("Burk") have each filed motions seeking

appointment as Lead Plaintiff and approval of their selection of lead counsel. At the hearing on June 28, 2004, the Court inquired about the criteria for selecting lead plaintiff in the derivative actions. One factor raised by the Court was the size of each of the prospective lead plaintiffs' holdings of Sonus stock. This Supplemental Memorandum of Law is submitted in response to the Court's inquiry.

Plaintiff Williams purchased 500 shares of common stock of Sonus on February 10, 2004 at \$7.45 per share, plus commission. Declaration of Daniel Williams at ¶1, Exhibit 1, attached. Williams currently owns all 500 shares and has pledged to continue holding same while this derivative action is pending. Id. at ¶2. Williams has over twenty years of investment experience in various types of securities and understands his responsibility as Lead Plaintiff, including the responsibility to participate throughout the litigation and to remain advised of the progress in this case and to monitor the actions of his selective counsel. Id. at ¶4. He is willing to accept and fulfill these responsibilities and if appointed as Lead Plaintiff, will vigorously pursue this action of behalf of Sonus. Id. at ¶4.

Williams is 52 years old and holds a Bachelor of Science degree in Business Management from Bethel University. Id. at ¶5. He is currently employed as the Postmaster of Union City, Tennessee and is also currently attending law school on a part-time track. Id. at ¶5. Williams has been in contact with his proposed lead counsel, William B. Federman of Federman & Sherwood and wants Mr. Federman and his law firm to serve as lead counsel in this litigation. Id. at ¶3. Williams and Mr. Federman have exchanged information concerning Sonus and the status of this case on several occasions and Williams is confident in Mr. Federman's ability and willingness to pursue

this litigation. Id. at ¶3. Indeed, Plaintiff Williams and his counsel, Federman & Sherwood, have already been working diligently and vigorously to protect the interests of Nominal Defendant Sonus and its shareholders. For instance, on July 1, 2004, Williams' counsel requested that Defendants take all steps necessary to safeguard and preserve documents relevant to this case, including all stored electronic documents and data. See Exhibit 2, attached. Moreover, the appointment of Williams as Lead Plaintiff and the approval of Federman & Sherwood as Lead Counsel and Alan Kovacs as Liaison Counsel, as requested by Williams, will result in efficiencies in prosecuting this action and savings to Sonus and its shareholders. Williams has requested the appointment of a single lead counsel and liaison counsel. In contrast, Plaintiffs Pisnoy and Burk have requested multiple lead counsel and liaison counsel. This will result in duplicative work by multiple counsel and increased expenses and attorney fees which will be borne by Sonus and its shareholders if the derivative action is ultimately successful.

Respectfully submitted,

s/Alan L. Kovacs

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CERTIFICATE OF SERVICE

This certifies that true and correct copies of the above and foregoing were delivered postage prepaid on August 4, 2004 to the following:

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